

1 THE HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 NXP USA, INC. and NXP B.V.,

10 Plaintiffs,

11 v.

12 IMPINJ, INC.,

13 Defendant.

14 No. 2:20-cv-01503-JHC

**JOINT MOTION TO ENTER SOURCE
CODE STIPULATION**

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NOTE FOR MOTION CALENDAR:
JANUARY 9, 2023

1 Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiffs NXP USA, Inc. and NXP B.V.
2 (collectively “NXP”) and Defendant Impinj, Inc. (“Impinj”) respectfully request that the Court
3 enter an order adopting the parties’ Stipulation Regarding Impinj, Inc.’s Circuit Schematics and
4 Source Code, attached hereto as Exhibit A.

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2 DATED: January 9, 2023
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By: /s/ R. Tyler Kendrick
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Attorneys for NXP USA, Inc. and NXP B.V.

1 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
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3 DATED: January 9, 2023

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Hon. John H. Chun
United States District Court Judge

EXHIBIT A

1 HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 NXP USA, INC., and NXP B.V.,

10 Plaintiffs,

11 v.

12 IMPINJ, INC.,

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14 NO. 2:20-cv-01503-JHC

15 STIPULATION REGARDING IMPINJ, INC.'S
16 CIRCUIT SCHEMATICS AND SOURCE
17 CODE

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1 Defendant Impinj, Inc. (“Impinj”) stipulates as follows:

- 2 1. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears
3 bates numbers IMPINJ_NXP_WDTEX_00006191 to
4 IMPINJ_NXP_WDTEX_00006515. This document represents the circuitry contained
5 in the M730 and M750 products.
- 6 2. Impinj produced circuit schematics in a document titled [REDACTED].pdf that
7 bears bates numbers IMPINJ_NXP_WDTEX_00006038 to
8 IMPINJ_NXP_WDTEX_00006190. This document represents the circuitry contained
9 in the Monza 4D, Monza 4E, Monza 4I, Monza 4QT, Monza 4E Dura, and Monza 4QT
10 Dura products.
- 11 3. Impinj produced circuit schematics in a document titled [REDACTED].pdf that
12 bears bates numbers IMPINJ_NXP_WDTEX_00004538 to
13 IMPINJ_NXP_WDTEX_00004732. This document represents the circuitry contained
14 in the Monza-X-8K product.
- 15 4. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears
16 bates numbers IMPINJ_NXP_WDTEX_00004733 to
17 IMPINJ_NXP_WDTEX_00004921. This document represents the circuitry contained
18 in the Monza X-2K product.
- 19 5. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears
20 bates numbers IMPINJ_NXP_WDTEX_00005392 to
21 IMPINJ_NXP_WDTEX_00005625. This document represents the circuitry contained
22 in the Monza R6-A, Monza R6-B, Monza R6-P and Monza S6-C products.
- 23 6. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears
24 bates numbers IMPINJ_NXP_WDTEX_00005626 to
25 IMPINJ_NXP_WDTEX_00006037. This document represents the circuitry contained
26 in the Monza 5 product.
7. Impinj produced circuit schematics in a document titled [REDACTED].pdf that

1 bears bates numbers IMPINJ_NXP_WDTEX_00004922 to
2 IMPINJ_NXP_WDTEX_00005391. This document represents the circuitry contained
3 in the Monza R6 product.

- 4 8. Impinj produced Verilog code in a directory named \Monza4_verilog\ . The code in this
- 5 directory correlates to each of the Monza 4D, Monza 4E, Monza 4I, Monza 4QT,
- 6 Monza 4E Dura, Monza 4QT Dura products.
- 7 9. Impinj produced Verilog code in a directory named \Monza5_verilog\ . The code in this
- 8 directory correlates to the Monza 5 product.
- 9 10. Impinj produced Verilog code in a directory named \MonzaR6_verilog\ . The code in
- 10 this directory correlates to each of the Monza R6, Monza R6-A, and Monza R6-B
- 11 products.
- 12 11. Impinj produced Verilog code in a directory named \MonzaR6P_verilog\ . The code in
- 13 this directory correlates to each if the Monza R6-P and S6-C products.
- 14 12. Impinj produced Verilog code in a directory named \MonzaX2K_verilog\ . The code in
- 15 this directory correlates to the Monza X-2K product.
- 16 13. Impinj produced Verilog code in a directory named \MonzaX8K_verilog\ . The code in
- 17 this directory correlates to the Monza X-8K product.
- 18 14. Impinj produced Verilog code in a directory named \M730_M750_verilog\ . The code
- 19 in this directory correlates to each of the M730 and M750 products.
- 20 15. Impinj produced source code in a directory named
- 21 \Impinj_Speedway_R700_Restricted\ . This directory contains subdirectories named
- 22 \r700\ and \speedway\ . The code in the \r700\ subdirectory correlates to the R700
- 23 product. The code in the \speedway\ subdirectory correlates to each of the Speedway
- 24 R420, Speedway R220 and Speedway R120 products. The code contained within the
- 25 \Impinj_Speedway_R700_Restricted\ directory that is not in the \r700\ or \speedway\
- 26 subdirectories is common to the R700, Speedway R420, Speedway R220, and
- Speedway R120 products.

1 16. Impinj produced source code in directories named \FastID\ex10_bundle_v1.02.00\,
2 \FastID\ex10_bundle_v1.02.00_w_utils\, [REDACTED], and [REDACTED].

3 The code in these directories correlates to each of the E310, E510, E710, and E910
4 products.

5 17. Impinj produced source code in a directory named \FastID\Indy Development Kit\. The
6 code in this directory correlates to each of the Indy RS500, Indy RS1000, and Indy
7 RS2000 products.

8 18. Impinj produced source code in a directory named \IndyMAC\. The code in this
9 directory correlates to each of the Indy R500, Indy R1000, and Indy R2000 products.

10 19. Impinj produced source code in a directory named \Gateway Products\. The code in
11 this directory correlates to each of the xArray, xSpan, and xPortal products.

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1 DATED this 15th day of November, 2022.

2 PERKINS COIE LLP

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